

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

MARTIN J. WALSH,	)	
SECRETARY OF LABOR,	)	
U.S. DEPARTMENT OF LABOR,	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	NO. 4:22-cv-03246-JMG-SMB
v.	)	
	)	
PACKERS SANITATION SERVICES,	)	
INC., LTD.,	)	
	)	
Defendant.	)	

**MOTION FOR DOCUMENT TO BE PLACED UNDER SEAL**

Plaintiff Martin J. Walsh, Secretary for the United States Department of Labor, files this Motion asking the Court to immediately place under seal Exhibit 1 of the motion recently filed by Defendant Packers Sanitation Services, Inc., LTD. (“PSSI”), which features the names of minor children in violation of Federal Rules of Civil Procedure 5.2(a)(3). In support of his Motion, the Secretary states as follows:

1. On the evening of November 16, 2022, counsel for PSSI filed a motion concerning the Preliminary Injunction hearing set before this Court for November 23, 2022. See ECF Doc. No. 9.

2. Attached to this motion as Exhibit 1 was an email from the Secretary’s counsel in which she provided the names of two minors who were employed by PSSI at the JBS Grand Island, Nebraska facility. The purpose of the Secretary’s counsel disclosing these names was strictly so PSSI could complete its obligation under the temporary restraining order entered by the Court on November 10, 2022.

3. When PSSI attached the email to its filing, it did not redact the minors' names and replace them with initials, as required by Federal Rule 5.2(a)(3).

4. Therefore, the Secretary moves this Court to immediately seal Exhibit 1 of ECF Doc. No. 9, pursuant to Federal Rule 5.2(d). This will allow Defendant the opportunity to correct its error and submit a redacted copy of the Exhibit 1 without the minors' names exposed.

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Solicitor of Labor

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/s/ Traci Martin  
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**CERTIFICATE OF SERVICE**

I certifying that the foregoing Motion for Document to be Placed Under Seal was served on November 17, 2022, via the Court's ECF system, to the following counsel for Defendant:

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/s/ Traci Martin